



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-5

Deonna Dean, Treasurer  
Rogers Group Inc. Political  
Action Committee  
P.O. Box 25250  
Nashville, TN 37202

AUG 11 2000

Identification Number: C00277152

Reference: April Quarterly Report (1/1/00-3/31/00)

Dear Ms. Dean:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule A supporting Line 11(a)(i) of your report discloses contributions received through what appears to be a payroll deduction plan. Please amend your report to disclose the amount deducted per pay period. 11 CFR §104.8(b) Please refer to the enclosed sample of properly reported payroll deductions.

-Please amend Schedule B supporting Line 23 by providing the office sought, including state and congressional district, if applicable, for each contribution made. 11 CFR §104.3(b)(3)(ii) and (v)

Any amendment or clarification should be filed with the Federal Election Commission. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division). My local number is (202) 694-1130.

Sincerely,

Andrea Wilkens  
Senior Reports Analyst  
Reports Analysis Division

## PAYROLL DEDUCTIONS

SCHEDULE A		ITEMIZED RECEIPTS		1 PAGE	OF
Contributions from Individuals				FORM LINE NUMBER	
Any information copied from such Receipts and Statements may not be used in whole or in part for the purpose of avoiding contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.				11(a)(2)	
NAME OF COMMITTEE (in Full)					
National Organization PAC 00000001					
A. Full Name, Mailing Address and ZIP Code		Name of Employer		Date (month, day, year)	Amount of Each Receipt for Period
Anne Sullivan 21 18th Street City, State ZIP		National Organization, Inc.		payroll deduction	\$80.00
Received For: <input type="checkbox"/> Other (insert) <input type="checkbox"/> Primary <input type="checkbox"/> General		Occupation		Aggregated Year-to-Date	
		Branch Manager		\$88.00	(\$15 biweekly)
B. Full Name, Mailing Address and ZIP Code		Name of Employer		Date (month, day, year)	Amount of Each Receipt for Period
Rodney Jones 881 Hamshury Road City, State ZIP		National Organization, Inc.		payroll deduction	\$180.00
Received For: <input type="checkbox"/> Other (insert) <input type="checkbox"/> Primary <input type="checkbox"/> General		Occupation		Aggregated Year-to-Date	
		Vice President		\$80.00	(\$80 biweekly)

Itemize payroll deductions only after they have exceeded \$200 per calendar year from an individual.

## Payroll Deductions

Once an individual's deductions aggregate over \$200 in a calendar year, report the total amount deducted from the donor's paychecks during the reporting period on Schedule A. In parentheses indicate the amount that was deducted each pay period. Instead of stating a specific date of receipt, write "payroll deduction" under "Date." The other itemized information, including the year-to-date total, must be completed for each donor. 104.8(b).

**EXAMPLE:** During an election year, a corporate manager authorizes her employer to deduct \$15 per pay period (each pay period is two weeks) for the company's SSF. The SSF, which files FEC reports on a quarterly schedule, includes the manager's first-quarter contributions (\$90 for six pay periods) as "unitemized contributions" on Line 11(a)(ii) in the April quarterly report.

By June 30 (the closing date for the July quarterly report), 13 pay periods have passed, and the manager's aggregate contributions are \$195—still below the \$200 itemization threshold. The manager's second-quarter contributions again are included in "unitemized contributions" in the July report.

By September 30 (the closing date for the October quarterly report), 19 pay periods have passed, and the manager's contributions reach \$285. Now the committee itemizes the total contributions received from the manager during the third quarter (\$90), providing the year-to-date total in the appropriate space. (See item A in the illustration above.)

## In-Kind Contributions

When determining whether to itemize an *in-kind* contribution, follow the same guidelines listed above under "When to Itemize Receipts." See page 8 for information on how to determine the dollar value of an *in-kind* contribution.

In addition, add the value of the *in-kind* contribution to the operating expenditures total on Line 21(b) (in order to avoid inflating the cash-on-hand amount). 104.13(a)(2).

If the *in-kind* contribution must be itemized on Schedule A, then it must also be itemized on a Schedule B for operating expenditures. See the illustration at left.

## IN-KIND CONTRIBUTIONS

SCHEDULE A		ITEMIZED RECEIPTS		1 PAGE	OF
Contributions from Individuals				FORM LINE NUMBER	
Any information copied from such Receipts and Statements may not be used in whole or in part for the purpose of avoiding contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.				11(a)(2)	
NAME OF COMMITTEE (in Full)					
National Organization PAC 00000001					
A. Full Name, Mailing Address and ZIP Code		Name of Employer		Date (month, day, year)	Amount of Each Receipt for Period
Martin L. Kress 4 River Road City, State ZIP		National Organization, Inc.		6/19/84	\$3,888.00 (IN-KIND)
Received For: <input type="checkbox"/> Other (insert) <input type="checkbox"/> Primary <input type="checkbox"/> General		Occupation		Aggregated Year-to-Date	
		Chairman		\$3,888.00	(HAPPY PRIZE)

SCHEDULE B		ITEMIZED DISBURSEMENTS		1 PAGE	OF
Operating Expenditures/Other Federal				FORM LINE NUMBER	
Any information copied from such Receipts and Statements may not be used in whole or in part for the purpose of avoiding contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.				21(b)	
NAME OF COMMITTEE (in Full)					
National Organization PAC 00000001					
A. Full Name, Mailing Address and ZIP Code		Name of Organization		Date (month, day, year)	Amount of Each Disbursement for Period
Martin L. Kress 4 River Road City, State ZIP		Happy Prize		6/19/84	\$3,888.00 (IN-KIND CONTRIBUTION)
Disbursement for: <input type="checkbox"/> Other (insert) <input type="checkbox"/> Primary <input type="checkbox"/> General		Type of Disbursement			
		Happy Prize			

Itemize *in-kind* contributions on both Schedules A and B so as not to inflate the cash-on-hand amount.

